



October 1, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Broadband Adoption Lifeline Pilot Program; WC Docket No. 11-42

Dear Ms. Dortch:

The Puerto Rico Broadband Task Force (PRBT) is a public-private partnership formed for the purpose of increasing broadband adoption by residents of Puerto Rico. The PRBT is composed of 12 members representing various sectors of the broadband ecosystem in Puerto Rico including the Office of Chief Information Officer, the Puerto Rico Telecommunication Regulatory Board, the Internet Society, telecommunications and broadband providers, information and communication technology providers, K-12 and Higher education, healthcare, local government, grassroots community groups and private sector groups.

The primary goal of the PRBT is to design and facilitate the implementation of a pragmatic and actionable State Broadband Strategic Plan that will effectively minimize the digital divide in Puerto Rico through the promotion of broadband technology. The plan will address issues including digital literacy training, barriers to broadband build out and affordability.

In May 2012, the PRBT released the first Puerto Rico Broadband Strategic Plan<sup>1</sup>, which: (a) provides a clear assessment of Puerto Rico's existing broadband landscape; (b) establishes future broadband capacity and adoption goals; and (c) addresses issues and challenges which must be addressed in order to achieve those goals including digital literacy training, affordability and barriers to broadband build out.

Affordability is clearly a factor in increasing broadband adoption. The US Census Bureau reported that in 2010, Puerto Rico's median household was just \$18,864, almost half that of Mississippi (\$35,851)<sup>2</sup>. While many factors contribute to broadband service fees, competition and a consumer's ability to choose from a variety of providers plays a key role in driving pricing down.

The PRBT supports the FCC's actions to implement a Broadband Adoption Lifeline Pilot Program, which will provide much needed resources to Puerto Rico's low-income households in order to facilitate broadband access.

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<sup>1</sup> <http://www.prbroadband.org/puerto-rico-broadband-strategic-plan/>

<sup>2</sup> <http://www.census.gov/prod/2011pubs/acsbr10-02.pdf>

Puerto Rico's particular level of need should warrant additional consideration by the FCC to the funding of not only one, but multiple Pilot Programs in Puerto Rico. In particular:

- Over 65% of Puerto Rico adults do not subscribe to broadband service<sup>3</sup>, in stark contrast to the rest of the United States where approximately 34% of adults do not subscribe<sup>4</sup>.
- In 2011, 45.6% of Puerto Rico residents lived below the national poverty level<sup>5</sup>. Puerto Rico's median household was just \$18,864, almost half that of Mississippi (\$35,851)<sup>6</sup>
- The cost of deployment & operations of broadband services are inherently higher than across other jurisdictions, leading to higher service fees that in the rest of the nation
- Given the high levels of need and low existing broadband adoption levels, Puerto Rico provides the greatest opportunity for data gathering for the FCC

The Puerto Rico Broadband Taskforce urges the FCC to strongly consider and approve multiple Pilot Programs in Puerto Rico under the FCC's Broadband Adoption Lifeline Pilot Program.

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<sup>3</sup> <http://www.connectpr.org/es/survey-results/residential>

<sup>4</sup> <http://pewinternet.org/Infographics/2012/Internet-Use-and-Home-Broadband-Connections.aspx>

<sup>5</sup> <http://www.census.gov/prod/2012pubs/acsbr11-01.pdf>

<sup>6</sup> <http://www.census.gov/prod/2011pubs/acsbr10-02.pdf>